

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

WILLIAM AYERS,

Plaintiff,

v.

C. P. BOURG, INC.

Defendant.

DOCKET NO. 04-cv-10137-FDS

ASSENTED TO MOTION TO EXTEND PRETRIAL DEADLINES

The plaintiff respectfully moves the Court allow him to extend pretrial deadlines by forty-five (45) days and amend schedule as follows:

1. Completion of non-expert written and deposition discovery by June 13, 2005.

2. Requests for admission to be served by June 30, 2005

3. That the status conference currently set for June 13, 2005 be postponed to a time convenient for the Court sometime after June 30, 2005, at which the Court shall hear counsel as (a) the status of discovery, (b) whether expert witnesses will be called at trial, (c) any schedule for expert discovery, and (d) any contemplated dispositive motions and the schedule for filing any such motions.

As grounds for this motion, the plaintiff states that the parties have been diligently pursuing discovery. Due to scheduling conflicts and the press of other business the parties do not anticipate being able to complete necessary depositions by the date previously set by the Court.

In addition, the parties have attempted to agree on and narrow outstanding issue regarding the remaining depositions. The parties anticipate that an additional 45 days will allow them to resolve any disputes and finalize non-expert discovery.

The defendant assents to this extension of time.

Respectfully submitted,

THE PLAINTIFF
By his Attorney,

/s/ Suzanne Garrow
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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing document was served upon the attorney of record for the Defendant by electronic mail on this date.

Dated: April 20, 2005

/s/Suzanne Garrow
Suzanne Garrow